

EXHIBIT A

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

NEETA THAKUR, *et al.*,

Plaintiffs,

v.

Civil Action No. 25-cv-04737-RFL

DONALD J. TRUMP, *et al.*,

Defendants.

DECLARATION OF ZACH YOUNG

I, Zach Young, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Senior Advisor to the Secretary of Transportation at the U.S. Department of Transportation (“DOT”). I have worked at DOT since April 14, 2025.
2. As a Senior Advisor, my responsibilities include reviewing DOT grants and grant programs and making recommendations on grants and grant programs that are inconsistent with DOT’s priorities.
3. Between April 14 and May 1, I personally reviewed all the active grants funded under DOT’s University of Transportation Center (UTC) grant program, including UTC grants to the University of California, Davis and University of Southern California. I did not use any search terms to identify specific UTC grants for review. I personally reviewed the UTC’s public-facing website and publications, and other individuals within the Office of the Secretary of Transportation reviewed statements of work.

4. I reviewed each UTC grant for consistency with DOT's priorities. Certain of those priorities are (1) promoting traditional forms of energy and natural resources to the greatest extent possible, (2) ensuring that taxpayer dollars are used efficiently in ways that maximally benefit the American people and improve their quality of life, and (3) ceasing to promote divisive diversity, equity, and inclusion initiatives that discriminate on the basis of race, national origin, or another protected characteristic. Those priorities were also described in the termination letters annexed hereto as Exhibit A (University of California, Davis) and Exhibit B (University of Southern California).
5. Certain DOT priorities are also illustrated by the Secretary of Transportation's memorandum on "Implementation of Executive Orders Addressing Energy, Climate Change, Diversity, and Gender" (annexed hereto as Exhibit C); DOT Order 2100.7, "Ensuring Reliance Upon Sound Economic Analysis in Department of Transportation Policies, Programs, and Activities" (annexed hereto as Exhibit D); and the Secretary of Transportation's April 24, 2025 letter explaining that all recipients of DOT funding must comply with their legal obligations (annexed hereto as Exhibit E). They are likewise illustrated by Executive Order 14148, which rescinded certain priorities of the prior administration, including the Justice40 initiative and policies related to climate change (annexed hereto as Exhibit F); and Executive Order 14222, which implements the President's "Department of Government Efficiency" cost efficiency initiative (annexed hereto as Exhibit G).
6. Based on my review of the UTC grants, and based on the policies described in paragraphs 4 and 5, I recommended to DOT leadership that certain UTC grants be terminated.

7. On May 2, 2025, DOT sent letters to the University of California, Davis, the University of Southern California, and five other UTC participants terminating their grants consistent with my recommendations for those grants.
8. I have prepared this declaration, with reference to the supporting documentation, to provide information “sufficient to show” the four categories of information that the Court has ordered for expedited discovery in this matter and, to my knowledge, there are no readily available non-privileged documents, other than those provided, which could substitute for the information in this declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 25th day of July 2025.

Zach Young 
Digitally signed by Zach Young
Date: 2025.07.25 11:50:34 -04'00'

Zach Young
Senior Advisor to the Secretary
U.S. Department of Transportation